

FILED

MAY 24 2017

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY OSBOURNE,

Defendant.

**4:17CR00233 RLW**

**INFORMATION**

The United States Attorney charges that:

**COUNT 1**

**[False Statements Relating to Health Care Matters]**

On or about August 3, 2012, the defendant,

**JEFFREY OSBOURNE,**

knowingly and willfully made and used materially false writings and documents, knowing the same to contain materially false, fictitious, and fraudulent statements and entries, in connection with the delivery of and payment for health care benefits, items, and services involving the Medicare program, a health care benefit program as defined in 18 U.S.C. § 24(b), in violation of 18 U.S.C. § 1035, in that the defendant created a progress note concerning patient R.T., a resident at Waunakee Manor in Waunakee, Wisconsin, that falsely stated that “[t]he patient or staff request treatment because the toenails are painful, ingrown, and remain symptomatic even when the resident is resting[]” when the defendant then and there well knew said statements and representations were false, fictitious, and fraudulent.

All in violation of 18 U.S.C. § 1035(a)(2).

**FORFEITURE ALLEGATION**

The United States Attorney further charges that:

1. Pursuant to Title 18, United States Code, Section 982(a)(7), upon conviction of an offense in violation of Title 18, United States Code, Section 1035 as set forth in Count 1, the defendant shall forfeit to the United States any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense or conspiracy.
2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

Date: 5/18/2017

CARRIE COSTANTIN  
Acting United States Attorney

Gilbert C. Sison  
GILBERT C. SISON, #52346MO  
Assistant United States Attorney

United States of America       )  
Eastern Division                )  
Eastern District of Missouri    )

I, Gilbert C. Sison, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

Gilbert C. Sison  
GILBERT C. SISON

Subscribed and sworn to before me this 18<sup>th</sup> day of May, 2017.

Gregory J. Luchessa  
CLERK, U.S. DISTRICT COURT

By: Michele Clayton  
DEPUTY CLERK